

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE : C. R. Bard, Inc., Pelvic Repair  
System Products Liability Litigation**

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**MDLs NO. 2187**

**CHIEF JUDGE JOSEPH R.  
GOODWIN**

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**This Document Relates to: All Cases**

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**MAG. JUDGE \_\_\_\_\_**

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**APPLICATION OF KIMBERLY R. WILSON FOR APPOINTMENT TO THE  
PLAINTIFFS' STEERING COMMITTEE**

In accordance with the provisions of Pre-Trial Order One (1) and in support of Plaintiffs' Preliminary Position Statement, Kimberly R. Wilson, of the law firm Lewis & Roberts, PLLC, respectfully makes this application for appointment to the Plaintiffs' Steering Committee ("PSC") for the C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2187; American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2325; Boston Scientific Corp., Pelvic Repair System Products Liability Litigation, MDL No. 2326; and, Ethicon, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327. In support thereof, I state as follows:

**1. Applicant Information:**

I am a partner in the law firm of Lewis & Roberts, PLLC with offices in Raleigh and Charlotte, North Carolina. (See Exhibit A: Wilson CV). I have devoted my entire practice over the last 16 ½ years to litigation; and, specifically the last 10 years to complex civil litigation involving defective medical devices and drugs; catastrophic personal injury; and medical malpractice cases.

I have been intimately involved in transvaginal mesh cases since July of 2011. I have participated in a series of organizational meetings with a group of attorneys, including but not

limited to Bryan F. Aylstock and Henry G. Garrard III, who represent thousands of clients with defective transvaginal mesh implants. I am counsel of record in the following cases: *Joyce Justus v Ethicon, Inc., Ethicon Women's Health and Urology, a Division of Ethicon, Inc., Gynecare, and Johnson & Johnson*, Western District of North Carolina Case No.: 12-cv-00057-MR-DSC; *Betty Funderburke v Ethicon, Inc., Ethicon Women's Health and Urology, a Division of Ethicon, Inc., Gynecare, and Johnson & Johnson*, Western District of North Carolina Case No.: 3:12-cv-00184-RJC-DSC; *Pamela R. Basta and Albert Basta v American Medical Systems, Inc., and C. R. Bard, Inc.*, Eastern District of North Carolina Case No.: 5:12-cv-00155-FL; *Valerie S. Moody and Richard T. Moody v C. R. Bard, Inc* Southern District of West Virginia Case No.: 2:12-cv-0877; and, currently have contracts of representation with 119 other clients. I will be filing many more lawsuits on behalf of my clients over the next several months; and, continue to get in new cases on a daily basis.

I have extensive experience in other cases involving dangerous and defective drugs and medical devices. Specifically, in New Jersey before the Honorable Carol Higbee, the Court chose 18 of my Vioxx cases for expedited discovery which resulted in me taking 64 depositions and working a case up for trial. I am also intimately involved in the Accutane litigation; and, was involved in Medtronic.

Moreover, I am a contract health care legislative affairs liaison for the North Carolina Advocates for Justice. I work on all issues with state legislators on behalf of NCAJ dealing with tort reform impacting pharmaceutical and medical device cases and medical malpractice, among others.

## **2. Willingness and Ability to a Time-Consuming Effort:**

I am personally committed to devote substantial time and resources to this matter and my

firm is prepared to commit other attorneys and paralegals. I understand that the scope of this litigation will require a full time commitment and significant expenses.

**3. Ability to Work Cooperatively with Others:**

For nearly two decades, I have worked cooperatively with many lawyers, a lot of whom are involved in this litigation; and, judges in MDL matters, as well as in mass tort cases in both federal and state courts. In the Vioxx, Accutane, Fen-phen and Medtronic litigations, I have demonstrated an ability to work with numerous other attorneys and law firms from across the country.

WHEREFORE, Kimberly R. Wilson, respectfully requests appointment to the Plaintiffs' Steering Committee.

Respectfully submitted,

/s/ Kimberly R. Wilson  
Kimberly R. Wilson  
KRW@lewis-roberts.com  
Lewis & Roberts, PLLC  
West Virginia State Bar No.: 6980  
North Carolina State Bar No.: 30044

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of March, 2012, I electronically filed the foregoing with the Clerk of the court by using the CM/ECF system which will send a notice of electronic filing.

/s/ Kimberly R. Wilson  
KIMBERLY R. WILSON